

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT**

**IN THE MATTER OF:**

Exigent Landscaping, LLC,  
*dba* Exigent Design and Build,  
Debtor.

Bankruptcy Case No. 23-46912-tjt  
Hon. Thomas J. Tucker  
Chapter 7

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**BRANDON HEITMANN'S MOTION FOR PAYMENT OF  
ADMINISTRATIVE EXPENSE**

Brandon Heitmann, through counsel, states as follows:

1. 11 U.S.C. section 503(b)(3)(D) provides,

11 U.S. Code § 503 - Allowance of administrative expenses  
...(b)After notice and a hearing, there shall be allowed  
administrative expenses, other than claims allowed under section  
502(f) of this title, including—(1)(A)the actual, necessary costs and  
expenses of preserving the estate including—  
(i)wages, salaries, and commissions for services rendered  
after the commencement of the case;”.

2. Movant is owed \$7,695.98 for services performed during  
the chapter 11 bankruptcy prior to conversion.

WHEREFORE, this Court should award Brandon Heitmann  
an allowed administrative expense in an amount of no less than  
\$7,695.98, and such further relief as this Court deems just.

Respectfully submitted,

\_\_\_\_/s/ Robert Bassel \_\_\_\_\_  
ROBERT N. BASSEL (P48420)  
Attorneys for Movant  
P.O. Box T  
Clinton, MI 49236  
(248) 677-1234  
[bbassel@gmail.com](mailto:bbassel@gmail.com)

Dated: 5.20.2024

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**ORDER GRANTING BRANDON HEITMANN'S MOTION FOR  
PAYMENT OF ADMINISTRATIVE EXPENSE**

Upon the filing of the above captioned motion, and the Court being fully advised in the premises;

IT IS HEREBY ORDERED that Brandon Heitmann shall have an allowed chapter 11 administrative expense in the amount of \$7,695.98.

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**NOTICE OF OPPORTUNITY TO RESPOND TO BRANDON  
HEITMA NN'SMOTION FOR PAYMENT OF ADMINISTRATIVE  
EXPENSE**

PLEASE TAKE NOTICE that Brandon Heitmann has filed the above-captioned motion for payment of an administrative expense.

**YOUR RIGHTS MAY BE AFFECTED.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

The Motion is available for review at the office of the Clerk of the U.S. Bankruptcy Court for the Eastern District of Michigan, located at 211 W. Fort Street, 17th Floor, Detroit, Michigan, or may be obtained by sending a **written** request to undersigned counsel at the address below. If you do not want the Court to grant the relief sought in the motion, or if you want the Court to consider your views on the motion, within 14 days you or your attorney must:

1. Communicate with the Court regarding your response or an answer explaining your position, at:

United States Bankruptcy Court, 211 W. Fort Street, Detroit, Michigan

You must also communicate your response to undersigned counsel at the address stated below.

**If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting the relief requested in the motion.**

Respectfully submitted,

\_\_\_\_/s/ Robert Bassel \_\_\_\_\_  
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Attorneys for Movant  
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**MEMORANDUM IN SUPPORT OF BRANDON HEITMANN'S  
MOTION FOR PAYMENT OF ADMINISTRATIVE EXPENSE**

Movant relies upon the authority cited in the underlying Motion.

Respectfully submitted,

\_\_\_/s/ Robert Bassel \_\_\_\_\_  
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**Certificate of Service**

The undersigned hereby certifies that on May 20, 2024, a true and correct copy of the forgoing was filed with the Clerk's office and will be noticed out electronically using the CM/ECF system which will send notification of such filing to all attorneys of record.

Respectfully submitted,

\_\_\_/s/ Robert Bassel \_\_\_\_\_

ROBERT N. BASSEL (P48420)

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